UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS	**Civ. No. 19-md-2875**
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION OF TEVA WITNESS MAHENDRA BAROT

TO: **Lori G. Cohen, Esq,**
GREENBERG TRAURIG, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305

Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Mahendra Barot**, on September 19, 2024, at 10:00 AM Eastern Daylight Time, via remote deposition while the witness is at Morgan Lewis, 502 Carnegie Center, Princeton, NJ 08540, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020

(Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in their individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEY FOR PLAINTIFFS:

David J. Stanoch, Esq.
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New Orleans, LA 70130
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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: September 5, 2024

FOR PLAINTIFFS

By: /s/ David J. Stanoch

David J. Stanoch
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EXHIBIT A

RULE 30(B)(6) TOPICS (*see* Original Notice for All Topics to Teva)

28. The communications with any regulatory authority, including but not limited to the FDA, with regard to the manufacturing process for Your API, and/or any modifications to the manufacturing process for Your API.
29. The communications with any regulatory authority, including but not limited to the FDA, with regard to the manufacturing process for Your finished dose, and/or any modifications to the manufacturing process for Your Finished Dose.
30. Your disclosures to regulatory authorities, including the FDA, with regard to the actual or potential contamination of Your API or Finished Dose with nitrosamines including NDMA, NDEA, or NMBA.
31. Your filings with regulatory authorities, including the FDA, regarding the manufacturing process, and any manufacturing process changes, for Your API or Finished Dose including in ANDA and Drug Master File filings and supplements.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for the deponent.

2. The complete production of the deponent's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

FOR PLAINTIFFS

By: /s/ David J. Stanoch
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